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6 *Attorneys for Defendant Discover*
 7 *Financial Services, LLC*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 NATHALIE SANTOS, an individual,

Case No.: 2:20-cv-02053-JCM-VCF

11 Plaintiff,

12 vs.

13 DISCOVER FINANCIAL SERVICES
 14 LLC, a foreign limited-liability company;
 EQUIFAX INFORMATION SERVICES,
 15 LLC, a foreign limited-liability company;
 EXPERIAN INFORMATION
 16 SOLUTIONS, INC., a foreign corporation,

**DISCOVER FINANCIAL
 SERVICES, LLC'S UNOPPOSED
 MOTION TO EXTEND
 DEADLINE TO RESPOND TO
 COMPLAINT**

(SECOND REQUEST)

17 Defendant.

18
 19 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Discover Financial Services,
 20 LLC ("Discover"), through its attorneys, respectfully requests that the Court extend the
 21 deadline in which Discover has to answer or otherwise respond to Plaintiff's Complaint, by
 22 fourteen (14) days, through and until February 8, 2021. In support of its Motion, Discover
 23 states as follows:

24 1. Plaintiff's Complaint was filed on November 6, 2020. ECF No. 1.

25 2. After executing a waiver of service, Discover's deadline to respond to the
 26 Plaintiff's Complaint was January 11, 2021.

27 3. Discover previously moved to extend its deadline by 14 days, through
 28 January 25, 2021 ("First Request"), which was granted by the Court. ECF No. 16.

4. Discover now respectfully requests that the Court extend Discover's deadline to respond to the Complaint by 14 days through and including February 8, 2021 ("Second Request").

5. Discover's Second Request is brought in good faith and not made to unnecessarily delay discovery or the proceedings in this matter. The parties anticipate a resolution of this matter and seek additional time to further gather and review information and finalize documentation.

6. No party will be prejudiced by the Second Request nor, respectfully, will the extension unduly burden the Court.

7. Counsel for Discover sought concurrence to this Motion from counsel for Plaintiff and concurrence was obtained to extend the deadline to February 8, 2021. Counsel for Plaintiff has agreed to extend the response deadline by fourteen (14) days.

WHEREFORE defendant Discover respectfully requests that the Court grant its Unopposed Motion to Extend Deadline to Respond to Complaint (Second Request), extending its deadline to answer or otherwise respond to Plaintiff's Complaint through and until February 8, 2021, and award such other relief the Court deems just and proper.

DATED this 22nd day of January, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ Matthew R. Tsai

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ORDER

IT IS SO ORDERED


United States Magistrate Judge

1-25-2021

Dated: _____

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of January, 2021, I caused a true and accurate copy of the foregoing document entitled *Discover Financial Services, LLC's Unopposed Motion to Extend Deadline to Respond to Complaint* to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

/s/ Annette Jaramillo
An employee of Lewis Roca
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